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February 11, 2000
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OFFICE
FOR
ADJUDICATION

Secretary, U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

DOCKET NUMBER
PETITION RULE PRM 26-2
(64FR67202)

Subject: Duane Arnold Energy Center (DAEC)
Docket No: 50-331
Op. License No: DPR-49
petition for Rulemaking; Request for Comments on Work Hour Limits
(64 Fed. Reg. 67202; December 1, 1999)

File: A-100

Dear Sir:

Federal Register (FR) Vol. 67, No 202 dated December 1, 1999, published for comment a petition for rulemaking requesting that the NRC add work hour limits to 10 CFR Part 26, add a criterion to 10 CFR 55.33(a)(1) to require evaluation of known sleeping disorders, revise the Enforcement Policy to include examples of work hour violations warranting various NRC sanctions, and revise NRC form 396 to include self-disclosure of sleeping disorders by licensed operators. The petition also requests changes to the NRC inspection procedure for the fitness for duty program. The DAEC fully endorses the comments being forwarded to your staff through the Nuclear Energy Institute and the conclusion that the rulemaking should be denied.

There are no new commitments made in this letter.

If you have any questions regarding this matter, please contact my office at 319-851-7238.

Sincerely,

Kenneth Putnam
Acting Manager, Regulatory Performance

cc: NRC Document Control Desk
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